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OFFICE OF GENERAL  
COUNSEL

September 9, 2010

VIA HAND-DELIVERY

MUR # 6371

Christopher Hughey, Esq.  
Acting General Counsel  
Federal Election Commission  
999 E Street, NW  
Washington, DC 20463

Re: Complaint Against Our Country Deserves Better PAC -  
TeaPartyExpress.Org, Christine O'Donnell, and Friends of Christine  
O'Donnell

Dear Mr. Hughey:

This letter constitutes a formal complaint filed pursuant to 2 U.S.C. § 437g(a)(1) against Our Country Deserves Better PAC - TeaPartyExpress.org ("TPAC"), a federal nonconnected political action committee, Christine O'Donnell, a Republican candidate for United States Senate in Delaware, and Ms. O'Donnell's principal campaign committee, Friends of Christine O'Donnell. Based upon information and belief, set forth below and in the attached materials, the Republican Party of Delaware files this complaint seeking an immediate investigation by the Federal Election Commission ("FEC" or "Commission") into the illegal spending practices of TPAC, and the illegal acceptance by Christine O'Donnell and her principal campaign committee, Friends of Christine O'Donnell, (collectively "O'Donnell") of excessive contributions from TPAC, and potentially TPAC's donors. Further, TPAC has solicited and accepted excessive earmarked donations for O'Donnell over which they have both exercised direction and control, and failed to properly forward and report.

The public record makes clear, and an investigation will no doubt confirm, that there is reason to believe that TPAC has illegally provided O'Donnell with support far exceeding TPAC's \$5,000 per election Federal contribution limit, and that O'Donnell has accepted that support, in violation of the Federal Election Campaign Act of 1971, as amended ("FECA" or "Act"), and Commission regulations. First, TPAC and O'Donnell have engaged in coordinated communications that amount to in-kind contributions from TPAC to O'Donnell in excess of TPAC's Federal contribution limits. Second, TPAC has solicited contributions specifically on behalf

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of O'Donnell and exercised direction and control over these earmarked contributions to O'Donnell, which have encompassed both TPAC's and individual contributors' Federal contribution limits to O'Donnell. Finally, TPAC has failed to properly report its excessive in-kind contributions to O'Donnell as well as its earmarking and conduit activity.

## **I. FACTUAL BACKGROUND**

On September 8, 2010, TPAC announced its support of Christine O'Donnell, a candidate for the Republican nomination for United States Senator from Delaware. O'Donnell was present, and spoke, at the TPAC press conference announcing TPAC's support for her. Prior to this event, O'Donnell had spoken at TPAC events in Delaware, such as an event hosted by the "Delaware 9-12 Patriots" in Dover on the evening of September 1, 2010. While speaking at the event, O'Donnell recognized and introduced Tiffany Ruegner, a Field Director for the Tea Party Express. O'Donnell then asked Ms. Ruegner to announce the TPAC website and explain how the audience could donate to TPAC. See Video: Tea Party Express Event, Hosted by the Delaware 9-12 Patriots, Dover, Delaware (Sept. 1, 2010) (on file with counsel and available upon request). In addition to speaking at TPAC events and promoting TPAC's fundraising website address, O'Donnell has also held closed door meetings with TPAC officials. For example, O'Donnell was seen entering a room with a TPAC official after TPAC's September 8, 2010 press conference and the door was subsequently closed to press thereafter. See Video: Post-Event Footage of the Tea Party Express Press Conference Announcing its Support of O'Donnell (Sept. 8, 2010) (on file with counsel and available upon request).

The publicity for the September 8, 2010 press conference stated that TPAC would be "holding a news conference in support of Christine O'Donnell's bid for U.S. Senate," and that the conference would "focus on the Tea Party Express's campaign efforts for the final push in support of O'Donnell's campaign for U.S. Senate." A true and correct copy of TPAC's pre-event publicity is attached hereto as Exhibit A.

Amy Ketterer, Chairman of TPAC, stated the following during the September 8, 2010 TPAC press conference:

We want to do everything we can to get behind [O'Donnell] and propel [her] to victory. And we do that by blanketing the state with TV and radio ads. Now we're raising money, all of this money is coming from across the country...[w]e already have radio and TV ads up here in Delaware, and I know that this is a very small state. But, you guys, I guess part of the state is also covered by Philadelphia TV and radio as well, so we are going to go up on the airwaves with Philadelphia TV and radio as well, in support of Christine O'Donnell.

See Exhibit A.

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In addition to the September 8, 2010 TPAC press conference, TPAC sent emails soliciting funds for TPAC to be used in support of O'Donnell, stating "please support our efforts to fight back by making a donation to our campaign to elect Conservative Republican Christine O'Donnell to the U.S. Senate. We are in the middle of a \$200,000 MoneyBomb for O'Donnell which you can support by making a contribution HERE." The email solicitation went on to state that the "election is just 7 days away" and that the maximum contribution an individual could contribute was \$5,000. A true and correct copy of a screenshot of the TPAC solicitation is attached hereto as Exhibit B. At the time of writing, TPAC's "O'Donnell MoneyBomb" had purportedly raised \$129,664.70, and the goal had been raised from \$200,000 to \$250,000. TPAC's spokesman Lew Russell stated that TPAC had already spent approximately \$60,000 in support of O'Donnell. True and correct copies of relevant media reports are attached hereto as Exhibit C.

On September 3, 2010, TPAC began airing radio advertisements, and on September 8, 2010, also began airing cable television advertisements supporting O'Donnell and opposing her Republican primary opponent, Congressman Mike Castle. In addition, TPAC has distributed direct mail pieces supporting O'Donnell and opposing Castle. These communications carry TPAC's disclaimer, state that they are not authorized by any candidate or candidate's committee, and have been reported to the FEC as independent expenditures. A true and correct spreadsheet detailing the cost of TPAC's TV media buy is attached hereto as Exhibit D. See also Fed. Election Comm'n, Filings of Our Country Matters Better PAC - ThePartyIsPac.org, <http://query.shtusa.com/exhibit/fecreg/PC00454074> (compiling TPAC's independent expenditure notices supporting O'Donnell and opposing Castle) (hereinafter "TPAC FE Notice Filings").

In addition, this evening TPAC will host a "Radiothon for Christine O'Donnell" during which, upon information and belief, candidate O'Donnell will make a speaking appearance. In connection with this event, TPAC has solicited funds to support O'Donnell. A true and correct copy of materials related to TPAC's O'Donnell radiothon is attached hereto as Exhibit E. Further, media reports state that TPAC is planning to hold at least two rallies, in Dover, Delaware and Sussex, Delaware, in support of O'Donnell. See Exhibit C. Finally, O'Donnell's campaign press secretary, Eran Quetzach, has stated that he speaks with TPAC daily. A true and correct screenshot of Mr. Quetzach's Facebook page is attached hereto as Exhibit F.

## II. LEGAL ANALYSTS

### A. There Is Evidence To Believe That TPAC and O'Donnell Violated FECA When TPAC Solicited Excessive Earmarked Contributions for O'Donnell

The Act provides for the earmarking of contributions "made by a person, either directly or indirectly, on behalf of a particular candidate." 2 U.S.C. § 441a(a)(8). All contributions by a person that are made on behalf of, or to, a candidate, including contributions that are in any way earmarked or otherwise directed to the candidate through an intermediary or conduit, are contributions from the person to the candidate. See 2 U.S.C. § 441a(a)(8); 11 C.F.R. § 110.6(a).

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If the intermediary or conduit exercises any direction or control over the choice of the recipient candidate, ~~however~~, the contributions are treated as contributions from both the original contributor and from the intermediary or conduit to the recipient candidate. See 11 C.F.R. § 110.6(d). Commission regulations define "earmarked" as "a designation, instruction, or encumbrance, whether direct or indirect, express or implied, oral or written, which results in all or any part of a contribution or expenditure being made to, or expended on behalf of, a clearly identified candidate or a candidate's authorized committee." 11 C.F.R. § 110.6(b)(1). In addition, the Commission has explicitly stated that soliciting contributions from individuals and stating that those contributions will be used to support a specific candidate is a form of earmarking. Contributions raised in response to a solicitation stating that it will be used to support a specific candidate are considered to be earmarked contributions and, therefore, contributions from both the original contributors and from the soliciting organization, which is considered to be a conduit or intermediary. See generally Matter Under Review 3620 ("Democratic Senatorial Campaign Committee").

Section 432(b) of the Act and Commission regulations at 11 C.F.R. § 102.8(a) require that persons who receive contributions on behalf of an authorized committee must forward the contributions to the treasurer no later than 10 days after receiving them. If the contribution exceeds \$50, the name and address of the contributor and the date of receipt must be forwarded with the contribution, and, if the contribution exceeds \$200, the contributor's employer and occupation must also be forwarded. The date of receipt of the contribution is the date that the person receiving the contribution obtains possession. See 11 C.F.R. 102.8(a). The Act and Commission regulations also require the intermediary or conduit to report the original source and the intended recipient of an earmarked contribution to the Commission and to the intended recipient. See 2 U.S.C. § 441a(a)(8); 11 C.F.R. § 110.6.

TPAC's solicitations clearly ask donors to contribute for the specific purpose of supporting O'Donnell. As such, all contributions received in response to these solicitations are not only earmarked for O'Donnell, but are earmarked at TPAC's direction and control. Moreover, TPAC is soliciting up to \$5,000 from individuals – an amount that exceeds an individual's personal contribution limit to O'Donnell. Additionally, it does not appear that TPAC has met any of its conduit reporting obligations. There is reason to believe that TPAC's earmarking scheme, of which O'Donnell is aware, has resulted in excessive contributions from both individuals and from TPAC to O'Donnell.

**B. There Is Reason To Believe That TPAC and O'Donnell Violated PECA By Disseminating Coordinated Communications, Resulting In Excessive In-Kind Contributions From TPAC to O'Donnell**

When a federal political action committee, such as TPAC, makes an expenditure for a communication that is coordinated with a candidate or candidate's campaign committee, the communication is an in-kind contribution to the candidate and is subject to the Act's contribution

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limits. See 11 C.F.R. § 109.20. Commission regulations establish a three-pronged test for determining whether a communication is coordinated with a candidate and, as established below, the activities of TPAC satisfy all three prongs. Accordingly, there is reason to believe that TPAC has made in-kind contributions to O'Donnell far in excess of TPAC's \$5,000 per election contribution limit when it paid for radio and cable television advertisements that were illegally coordinated with O'Donnell.

### 1. Payment Prong

In order for the payment prong of the Commission's coordination regulations to be satisfied, an entity apart from the candidate or the candidate's campaign committee must pay, in whole or in part, for the communication. See 11 C.F.R. § 109.21(a)(1). This prong is satisfied when an entity apart from the candidate or the candidate's campaign committee pays for a communication at issue. TPAC satisfied the payment prong by paying for the communication at issue. See Exhibit C; TPAC IE Notice Filings; see also *Common Sense Conservative Christine O'Donnell for U.S. Senate*, Our Country Deserves Better PAC - TeaPartyExpress.org, Sept. 2, 2010, <http://www.youtube.com/watch?v=nEasUPaUPo8> (radio ad); *Defeat Liberal Mike Castle*, Our Country Deserves Better PAC - TeaPartyExpress.org, Sept. 2, 2010, <http://www.youtube.com/watch?v=3wRbToXaiDs> (TV ad); *Christine O'Donnell - Common Sense Conservative for U.S. Senate (Delaware)*, Our Country Deserves Better PAC - TeaPartyExpress.org, Sept. 2, 2010, <http://www.youtube.com/watch?v=yWUChWruudE> (TV ad) (collectively "TPAC Radio and TV Advertisements").

### 2. Content Prong

In order for the content prong to be satisfied, the communication must be considered a public communication<sup>1</sup> and must meet any one of the following standards: (1) the public communication republishes, disseminates, or distributes candidate campaign materials; (2) the public communication expressly advocates the election or defeat of a clearly identified federal candidate at any time; or (3) the public communication refers to a clearly identified House or Senate candidate and is publicly distributed in the candidate's jurisdiction within ninety (90) days of the candidate's primary or general election. See 11 C.F.R. § 109.21(c).

TPAC's radio and cable television advertisements qualify as public communications and refer to a clearly identified U.S. Senate candidate, either Christine O'Donnell or Mike Castle. The advertisements were publicly distributed in Delaware, the candidate's jurisdiction, and such distribution began on September 3, 2010, which is within ninety days of Delaware's primary election. In addition, the advertisements expressly advocate the election of O'Donnell and expressly advocate

<sup>1</sup> "Public communication means a communication by means of any broadcast, cable, or satellite communication, newspaper, magazine, outdoor advertising facility, mass mailing, or telephone bank to the general public, or any other form of general public political advertising. The term general public political advertising shall not include communications over the Internet, except for communications placed for a fee on another person's Web site." 11 C.F.R. § 100.26.

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the defeat of Castle. See Exhibit C; TPAC Radio and TV Advertisements. Accordingly, TPAC's advertisements satisfy the content prong.

### 3. Conduct Prong

In order for the conduct prong of the Commission's coordination regulations to be satisfied, one of five conduct standards must be met. Relevant here are the following three standards:

Request or Suggestion. The conduct prong is met if the person creating, producing, or distributing the communication does so at the request or suggestion of a candidate, authorized committee, or any agent thereof; or if the person paying for the communication suggests the creation, production, or distribution of the communication to the candidate, authorized committee, or any agents thereof, and the candidate assents to the suggestion. See 11 C.F.R. § 109.21(d)(1).

Material Involvement. The conduct prong is met if a candidate, authorized committee, or any agents thereof, are "materially involved" in the decisionmaking regarding the: (1) content of the communication; (2) intended audience; (3) means or mode of the communication; (4) specific media outlet used; (5) timing or frequency of the communication; or (6) size or prominence of a printed communication or duration of a communication by means of broadcast, cable, or satellite. See 11 C.F.R. § 109.21(d)(2).

Substantial Discussion. The conduct prong is met if a communication is created, produced, or distributed after one or more substantial discussions between the individual paying for the communication (or the person's agents) and the candidate or candidate's opponent (or the candidate's agents). A discussion is "substantial" if information about the plans, projects, activities, or needs of the candidate that is material to the creation, production, or distribution of the communication is conveyed to the individual paying for the communication. See 11 C.F.R. § 109.21(d)(3).

TPAC's actions clearly satisfy all three of these standards. Not only has O'Donnell appeared at TPAC events in the past, but she has publicly touted TPAC's contribution website and held closed door meetings with TPAC officials. O'Donnell was present and spoke at the September 8, 2010 TPAC press conference during which TPAC announced its endorsement of her and plan to actively support her candidacy. All of these actions occurred before or contemporaneously with TPAC's the airing of TPAC's advertisements supporting O'Donnell and opposing Castle. At a minimum, TPAC's announcement of its endorsement and planned activities to support her candidacy constitute a suggestion and O'Donnell's presence at such an announcement and continued close interaction with TPAC constitute her assent. Given O'Donnell's awareness of TPAC's solicitations, planned advertisements, and general activities, it is inconceivable that TPAC's communications were made without substantial discussions with O'Donnell, O'Donnell's material involvement, or the request or suggestion of O'Donnell. As such, there is reason to believe that TPAC has made extensive in-kind contributions to O'Donnell when it paid for radio and cable television advertisements that were illegally coordinated with O'Donnell.

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Accordingly, the Republican Party of Delaware respectfully requests that the Commission conduct a thorough investigation on an expedited basis into the violations outlined above and enter into a prompt conciliation with the respondents to remedy the alleged violations and to ensure that these violations immediately cease and do not reoccur.

The above is correct and accurate to the best of my knowledge, information, and belief.

Sincerely,

*Brandis L. Zehr*

Michael E. Toner  
Brandis L. Zehr  
Counsel to the Republican Party of Delaware

SWORN TO AND SUBSCRIBED before me on this 9<sup>th</sup> day of September, 2010.

*Jawnyer L. Bonner*  
Notary Public

My commission expires:

7/31/2013

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**EX. A**

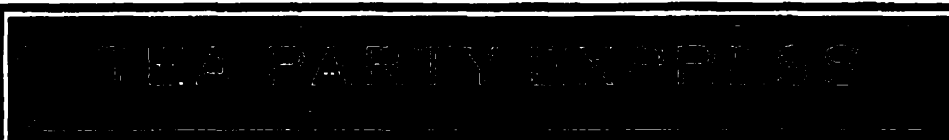


From: Levi Russell - Tea Party Express

Date sent: 09/06/2010 06:09:09 pm

Subject: NEWS CONFERENCE: Tea Party Express Powers Up for Christine O'Donnell for U.S. Senate

\*\*\*\*\*



FOR IMMEDIATE RELEASE: September 6, 2010

CONTACT: Levi Russell at (509) 979-6615 or via email at: [Levi@FrontLineStrat.com](mailto:Levi@FrontLineStrat.com)

## **NEWS CONFERENCE:**

### **Tea Party Express Holds News Conference Unveiling Final Push for Christine O'Donnell for U.S. Senate**

The Tea Party Express (website: [www.TeaPartyExpress.org](http://www.TeaPartyExpress.org)) will hold a news conference in support of Christine O'Donnell's bid for U.S. Senate this Tuesday, September 7, 2010 at 4727 Concord Pike in Wilmington, DE.

The news conference will begin at 11:00 AM and will focus on the Tea Party Express's campaign efforts for the final push in support of O'Donnell's campaign for U.S. Senate.

Tea Party leaders, strategists, performers, and local Delaware Republican and tea party activists will be on hand for this significant news conference.

##

**\*VIEW EMAIL AS A WEBPAGE\***

**\*FORWARD THIS EMAIL TO OTHERS\***

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\*\*\* END \*\*\*

Media organizations wishing to schedule an interview with a representative of the Tea Party Express, should contact Levi Russell at (509) 979-6615 or via email at: [Levi@FrontLineStrat.com](mailto:Levi@FrontLineStrat.com)

AMY KREMER, CHAIRMAN OF THE TEA PARTY EXPRESS: What we've done is when we got in, when we get behind somebody, we do it because we absolutely support that person, we love them, we want to do everything that we can to get behind them and propel them to victory. And we do that by blanketing the state with TV and radio ads. Now we're mixing money, all of this money is coming from across the county, and that's been the amazing thing of technology and the internet. The money is coming in from across the county that enables us to do that. We already have radio and TV ads up here in Delaware, and I know that this is a very small state. But, you guys, I guess part of the state is also covered by Philadelphia TV and radio, so we are going to go up on the airwaves with Philadelphia TV and radio as well, in support of Christine O'Donnell.

AMY KREMER: But Tiffany has just told me that we've had a special guest arrive -- Yay. Miss Christine O'Donnell.

CHRISTINE O'DONNELL: This is exciting. This is really exciting. This is the year where we're putting party principles over party power. And this is the year, this is the year when that's a winning strategy. So that's very exciting to see. And I cannot thank you enough for being here and for Tiffany and everyone for coming here to Delaware to give us the reinforcements that we need.

My opponent is an Obama Republican who can't defend his liberal voting record so he's resorting to mudslinging. And it's a shame that an incumbent Congressman has to stoop that low. But what is so exciting and energizing about all this is you're not being duped. You see right through that. And since he started his mudslinging our poll numbers have gone up and our online contributions have increased. So thank you for that.

Thank you for that because I am optimistic. I'm optimistic that we can begin the effort to turn the tide in our country, and get our country back on track. But we can't do it by spending our way to recovery and taxing our way to prosperity, but that's exactly what Barack Obama is proposing, and it's exactly what Mike Castle is continues to support. And that's got to stop. It's got to stop by putting commonsense into practice. I believe that the best thing the government can do to get our country back on track is to get out of the way of the entrepreneurs, get out of the way of the small business owner, and begin recovery based on the private sector. And with your help, and with your support, I am immediately going to Washington in November and begin the fight to restore honor to the American political system.

So let me remind you before I close, I had a reporter say to me, "No, you would be doing that in January." Well, because this is a special election for the U.S. Senate seat once held by Joe Biden, the winner can be sworn in the day after election day. And Harry Reid has said he's going to have a lame duck session where bills too liberal to get enough support, like cap-and-trade bills that of course Mike Castle supports, will be coming up in that lame duck session. So if we continue to keep our eye on the prize, and keep strengthening each other based on our principles and not give up, we can win.

And let me debunk one other myth. One thing that's being pushed out there is that I may be able to win the primary but not the general. Well, Rasmussen, when Joe Biden was in town campaigning for Chris Coons, Rasmussen did a poll, one had me within a five point margin, the other had me at a two point lead. So when we have the full weight of 'We the People' behind us after we win the primary, I have no doubt that we can turn that two point lead to a 10 point lead, and have victory in November. So with that, this is the Tea Party Express' event, so I'm going to close and just thank

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you all because a little under a year ago, I asked the voters in Delaware to give me an opportunity to earn your trust, to earn your support because I need your vote on September 16. And it seems like I've earned it, so I'm humbled so much to say thank you for that.

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**EX. B**

From: Joe Wierzbicki - Tea Party Express

Date sent: 09/07/2010 04:09:14 pm

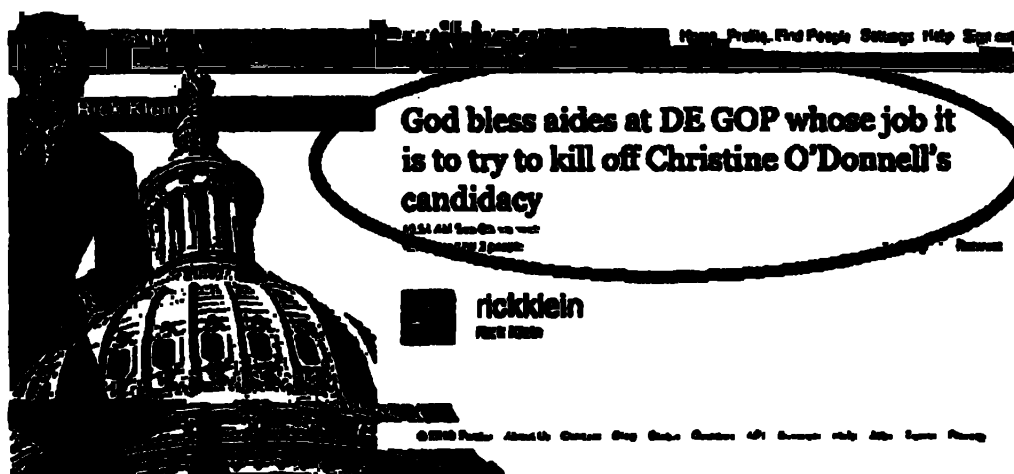
Subject: UPDATE: Backlash against media for celebrating RINO's efforts to "Kill Off" Conservative's Campaign

[REDACTED]

**The Tea Party Express Proudly Endorses**  
**★ Christine O'Donnell ★**  
**For U.S. Senate**

Earlier today we reported on a message from ABC News' Rick Klein who is their Washington bureau political news editor. ABC's Klein said "God Bless" the GOP establishment for trying to "kill off" the candidacy of the conservative candidate for U.S. Senate in Delaware - Christine O'Donnell.

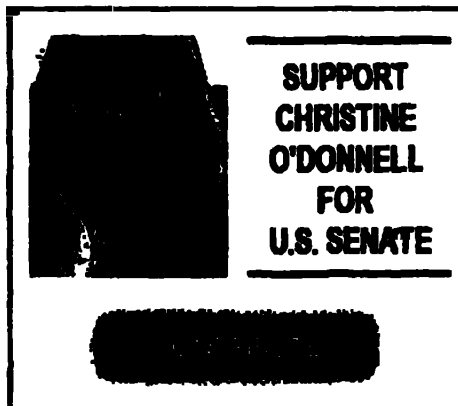
Blogger extraordinaire, Dan Riehl, first broke this story (see his post - [HERE](#)). And the outrage continues to grow. Please see the Tweet from ABC News' Klein below, and help us fight back against the media bias and the dirty tricks of the political establishment by making a contribution to our campaign for Christine O'Donnell for U.S. Senate - [CONTRIBUTE HERE](#).



If you are as angry as we are to see the liberal media teaming up with liberal politicians to "kill off" conservative candidates, then please support our efforts to fight back by making a donation to our campaign to elect Conservative

Republican Christine O'Donnell to the U.S. Senate.

We are in the middle of a \$200,000 MoneyBomb for O'Donnell which you can support by making a contribution - EEEE.



Please - forward this to all your conservative friends. Ask everyone you know to match your contribution. We are up against the entire political establishment and obviously the liberal news media - and clearly they want to see us lose this race. But we CAN win - if we all stand united on the principles of constitutional conservatism.

\*\*\*We need 500+ people to contribute \$100 or more in the next 24 hours.

\*\*\*We need 700+ people to contribute \$500 or more in the next 24 hours.

Make a donation. And tell a friend to help too. Heck, please tell 10 or more friends to pitch in and help too. We've got a lot of work to do - and the Election is just 7 days away!

We're going to need the support of thousands of you who can afford a more generous contribution of \$250, \$500, \$1,000 - up to the maximum of \$5,000.

\*VIEW EMAIL AS A WEBPAGE\*

\*FORWARD THIS EMAIL TO OTHERS\*

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**\$250,000**  
**\$200,000 MoneyBomb**  
**To Elect Christine O'Donnell**  
**And Defeat NRC Mike Castle**  
*Delaware voters must hear from us by Sept 14!*

Our goal is to raise \$250,000 in contributions to help elect Christine O'Donnell to the U.S. House of Representatives in Delaware's 1st Congressional District. We need your help to reach our goal. Please contribute today!

**As of Wednesday 8/8 - 12:00PM, Our MoneyBomb Has Raised: \$128,004.70**

Contributions are not deductible for income tax purposes. Corporate and foreign funds are not permitted.

#### Name

Title:  First Name:  Last Name:  Suffix:

#### Address

Type:  Address:  Unit/Apt:   
 City:  State:  Zip:

#### Additional Information

Phone Type:  Area Code & Phone Number:   
 Email Address:  Occupation:  Employer:   
If self-employed, please enter the name of your business.

#### Affirmation

☐ Please affirm you are using a personal credit card, as we cannot accept corporate contributions.

I would like to make a contribution of: \$



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**EX. C**

# POLITICO

## Tea party ramps up for O'Donnell

By David Calabrese  
September 7, 2010 02:06 PM EDT

The Tea Party Express says it's only begun to fight in Delaware's Republican Senate primary — and is promising a flurry of ads, direct mail, a pair of rallies and even a radiothon on behalf of underdog Christine O'Donnell over the coming days.

Despite aggressive push-back from the state party and a fresh poll calling into question her general election viability, the same national tea party group that helped propel candidates in Nevada and Alaska reiterated its commitment to O'Donnell on Tuesday, noting it has only spent a quarter of the resources it plans to deploy on her behalf.

Tea Party Express spokesman Levi Russell said the group has spent only about \$60,000 so far, but will amp up its activity later this week to reach its goal of about \$250,000 by next Tuesday's primary.

That includes a higher rotation of the radio and television ads it has aired on O'Donnell's behalf, labeling front-runner Rep. Mike Castle a liberal who "just keeps supporting the failed policies of Nancy Pelosi and Harry Reid," a direct-mail piece comparing the two candidates on fiscal issues and a pair of rallies in Dover and Sussex.

The Express will take over the WDEL radio airwaves for two hours Thursday to promote O'Donnell, and it's promising calls

from notable conservative voices.

"We'll definitely have some good names to look out for," Russell said, declining to reveal what figures were expected to call in.

Russell also said the group has enlisted a few hundred of its 400,000 members

Advertisement

## Did you know...

Nestlé employs more  
than 44,000 people  
in 47 states.



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# POLITICO

nationwide to participate in its home phone-banking program, in which ten parties will make calls outlining the differences between Castle and O'Donnell.

And it hasn't ruled out conducting another poll to test the effectiveness of the messages they are sending to primary voters.

"We're definitely considering it. If we do, it will only be to fine tune our strategy. The decision has been made that we are full speed ahead for Christine no matter what," he said.

A poll taken last week by NSON Opinion Research on behalf of Tea Party Express showed O'Donnell within 2 percentage points of Castle.

But a new Rasmussen Reports survey out Tuesday showed O'Donnell trailing presumptive Democratic nominee Chris Coons by double-digits, a disadvantage that the state Republican Party was quick to highlight.

While the Sept. 2 poll showed Castle with an 11-percentage-point lead over presumptive Democratic nominee Chris Coons, it had O'Donnell trailing Coons, the New Castle County executive by that same margin. Rasmussen did not poll the primary, which prompted an allegation from O'Donnell's camp that the firm was taking orders from the Republican establishment in Washington.

A spokeswoman for Rasmussen said it has always been the firm's policy to poll

primaries with much less frequency than general elections. "The O'Donnell campaign is simply doing the same thing that many campaigns do when they don't like the results. Rather than addressing what polls tell them, they seek to shoot the messenger," Rasmussen spokeswoman Debra Falk told POLITICO.

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# POLITICO

A state party release said Rasmussen's general election numbers were a sign of O'Donnell's "depleted support" after "immense scrutiny . . . of her reckless finances and enormous debt."

To hammer home the message, the Castle campaign went up with a new television ad on Tuesday that outlines the long list of claims against O'Donnell, including reports that she faced a lawsuit by Fairleigh Dickinson University for unpaid expenses, defaulted on her mortgage and ran up a campaign debt from her previous campaigns.

Meanwhile, seizing an opening into the GOP foray, the Democratic Senatorial Campaign Committee put up a new website called *Mike Castle's Washington House of Waffles*, designed to portray the nine-term congressman as a flip-flopper on issues such as abortion, the federal stimulus and earmarks.

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**EX. E**

Chat (12)

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## Radiothon for Christine O'neill

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Share · Public Event

**Time** Today · 7:00pm - 9:00pm

**Location** WDEL 1500 AM and live online at WDEL.com

**Created By** Our Country Deserves Better PAC

**More Info** Please tune in for a special broadcast by the Tea Party Express to raise money and awareness for the conservative candidate for US senate Christine O'Donnell. It will be an exciting hour of radio packed with special guests and important information, so invite your friends now, turn on your windows and listen loud.

Call in your donations between 7-9 Radiothon during the 800-844-1250

We'll be on the airwaves for the full first hour and the second hour will continue via live stream online.

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Stephen R. Maloney



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Earl Harts Spector



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Lori Sue



Ellen Jendic



Howard Strat



De Ann Savatone

34 Maybe Attending

View



Judy Schreuder

530 Awaiting Reply

View



Susan Rivers

207 Not Attending

View

Wall



Susan Rivers Don't live in Delaware

11 hours ago · Comment · Like · Flag



Linda M Smith I plan to attend. I hope to see you.

Tuesday at 7:41am · Comment · Like · Flag



Judy Schreuder We must actively participate and DO EVERYTHING FOR CHRISTINE TO WIN 9/14- She will actually be seated into BIDEN'S seat on Wed morning NOV 3...SWORN IN BY - GUESS WHO - HAHHAH- VP BIDEN HIMSELF

September 3 at 11:50pm · Comment · Like · Flag



Kate Sawdley will only be able to attend part of it for JHR getting off work, but Christine is a great candidate and just the sort of person we all need to turn this Nation around

September 3 at 11:22am · Comment · Like · Flag



Letty Brommenschel We are working to get our candidate elected in OH... however, we will advance any info that helps your candidate if they are true conservative...

September 3 at 12:02am · Comment · Like · Flag



Raymond Broady live in Fla but good luck

September 3 at 12:02pm · Comment · Like · Flag



Kate Sawdley have to work

September 3 at 10:00pm · Comment · Like · Flag



Jane Kidd Hang in there, Christine!

September 3 at 9:24pm · Comment · Like · Flag



Jeffery Marchese 3 POLICE: Dead Host in House Senate Race!

9/03/10

Reply

Set Photo - Tea Party Express Add to contacts

Set Photo

Monday at 4:16am · Like

Write a comment.



Sandra Kuzin McCray I will be there in spirit!

September 3 at 4:15pm · Comment · Like · Flag



Barbara Knauffman Should have been 10/5 BK

Chat (12)

September 3 at 11:50am · Comment · Like · Flag



Barbara Kneffman Hi Dave & Mar-Gary I can not attend- that day is full. I am looking at my replacement 10RS and energy at a premium. Much to do and my body only allows me so much time to do it. BK

September 3 at 11:11am · Comment · Like · Flag

Janet McCarthy All tired minded males and females should attend...

September 3 at 10:57am · Comment · Like · Flag



Edward Mouton Sorry, But I will be working - JD Hiram McKay/Ocean City, Md.

September 3 at 9:34am · Comment · Like · Flag



Russell Lyons I live in Indiana

September 3 at 7:44am · Comment · Like · Flag



Our Country Distance Station and for those people not nearby, please live online at WCL.com

September 3 at 3:46pm · Like

Write a comment...



Susan Rivers Live in the southwestern US

September 3 at 7:32am · Comment · Like · Flag

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**EX. F**



1. What is the purpose of the study?

By: **Christina O'Donnell for US Senate**

**2 people like this.**

**September 2 at 4:36pm via Twitter**

100

**September 2 at 11:54am via TweetCaster**

**of 2 people like this.**

September 2 at 11:38am

**2007**

September 2 at 12:12pm

David August he just want's shots of her body... he dreams about her... u should see the child I got this morning about the colored things... I wanted to laugh, he likes I did... I can't believe the guy who says it was him, said spoke with gap he with smile...